

IN THE COURT OF COMMON PLEAS
JEFFERSON COUNTY, OHIO

MARYBELLE CLINE
1511 Commerce St.
Wellsville, Ohio 43968

and

JAMES CLINE
1511 Commerce St.
Wellsville, Ohio 43968

Plaintiffs

-vs-

ROBERT H. EDWARDS, M.D.
2555 Parkway
East Liverpool, Ohio 43920

and

ROBERT H. EDWARDS, M.D., LLC
c/o Robert H. Edwards, M.D.
2555 Parkway
East Liverpool, Ohio 43920

Defendants

2016 AUG 30 A 10:07

JOHN J. COUGHLIN
CLERK OF COURTS
JEFFERSON COUNTY, OH

CASE NO.

JUDGE

16-CV-419
Michelle D. Hill
COMPLAINT FOR MEDICAL
MALPRACTICE

Affidavit of Merit Attached

Jury Demanded

Plaintiffs Marybelle Cline and James Cline for their Complaint state:

Parties

1. At all times relevant to this Complaint, Plaintiff, Marybelle Cline was a patient of, and/or was under the medical care and/or treatment of Defendants Robert H. Edwards, M.D. and Robert H. Edwards, M.D. LLC.
2. Plaintiff James Cline is Marybelle Cline's husband.
3. Defendant Robert H. Edwards, M.D. is a medical doctor licensed to practice medicine in Ohio and, at the times relevant to this Complaint, was responsible

EXHIBIT

1

for the care and treatment of Plaintiff, Marybelle Cline.

4. At all times relevant to this Complaint, Defendant Robert H. Edwards, M.D. was acting in the course and scope of his employment by and/or agency for Defendant, Robert H. Edwards, M.D. LLC.

First Cause of Action

5. On or about November 3, 2015, Plaintiff, Marybelle Cline underwent a total abdominal hysterectomy with removal of both falopian tubes and ovaries performed by Defendant Robert H. Edwards, M.D. at Trinity Medical Center in Steubenville, Jefferson County, Ohio.

6. Following that surgical procedure, Plaintiff, Marybelle Cline developed symptoms of bilateral ureteral obstruction and upon evaluation and treatment, was found to have suffered obstructive injury to both ureters during Defendant's performance of the hysterectomy, unrecognized by Defendant at the time of the procedure and before closure.

7. Defendant Edward's care and treatment of Plaintiff, Marybelle Cline with respect to the hysterectomy was negligent and deviated from the standard of care in that Defendant Edwards, among other things, failed to adequately identify the ureters prior to ligation; injured both ureters in the procedure; and failed to recognize, diagnose and timely treat the injuries to the ureters before completion of the procedure.

8. Plaintiff, Marybelle Cline suffered injuries and damages as a direct and proximate result of Defendant Edward's negligence and deviation from the standard of care, including but not limited to, a delay in diagnosis and treatment that caused subsequent injury and necessitated further extensive surgery, nephrostomy and other.

treatment, personal injuries, bodily pain and emotional and mental anguish, which continues to this day as well as medical and other expenses.

Second Cause of Action

9. Plaintiffs reallege paragraphs one through eight of their Complaint.

10. As a direct and proximate result of Defendant's negligence, James Cline has been deprived of the society, companionship, affection and comfort of his wife, Marybelle Cline.

11. Because of the injuries and damages suffered by Plaintiff, Marybelle Cline are continuing, Plaintiff, James Cline will suffer future loss of society, companionship, affection and comfort of his wife, Plaintiff Marybelle Cline.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount exceeding \$25,000.00 together with costs, pre-judgment interest, and such other relief as may be available in law or in equity.

Respectfully submitted,

GREEN, HAINES, SGAMBATI CO., L.P.A.



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Jury Demand

Plaintiffs demand a trial by jury.

GREEN, HAINES, SGAMBATI CO., L.P.A.



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Instructions for Service

TO THE CLERK: Pursuant to Rule 4 of the Ohio Rules of Civil Procedure, please issue the foregoing Complaint with Summons upon Defendants at the addresses listed in the caption of the Complaint.



RICHARD A. ABRAMS (0014382)
Co-Counsel for Plaintiffs